

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<i>In re:</i>	§	
	§	
HOUSTON REAL ESTATE PROPERTIES, LLC	§	Case No. 22-32998 (Chapter 7)
	§	
<u>Debtor,</u>	§	
	§	
JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF,	§	
	§	
Plaintiffs,	§	Adversary No. 23-03141
	§	
v.	§	
	§	
HOUSTON REAL ESTATE PROPERTIES, LLC, et al.,	§	
	§	
Respondents.	§	

**SHAHNAZ CHOUDHRI'S
EMERGENCY MOTION TO CANCEL DEPOSITION**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE

THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE JUDGE OF SAID COURT:

TO THE HONORABLE JEFFREY P. NORMAN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Shahnaz Choudhri (“Movant”) and files this Emergency Motion to Cancel Deposition (the “Motion”) currently set to take place on November 8, 2024 at 11:00am and would respectfully show as follows:

1. On November 7, 2024, Movant was admitted, and was treated, at the Post Oak Emergency Room.
2. Movant has an infection that is causing issues within her body, including her gastrointestinal system. She is currently medicated, has been instructed by the physician to stay away from others to support her overall healing.
3. There is a deposition scheduled for the Movant today at 11:00am, however, due to the infection, Movant is unable to attend.
4. Movant would ask that the court cancel the deposition scheduled for November 8, 2024 at 11:00am.
5. Movant requests emergency relief and consideration on November 8, 2024 at 11:00am.

For these reasons, Movant would ask that this court cancel the deposition currently scheduled for November 8, 2024 at 11:00am.

Dated: November 8, 2024

Respectfully submitted,

/s/ James Q. Pope
James Q. Pope
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Houston, Texas 77036
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CERTIFICATE OF CONFERENCE

I hereby certify that on November 8, 2024 at 7:56am, I sent email correspondence to T. Michael Ballases, with a copy of the email also sent to Steven Leyh, to advise of the updated medical status of Ms. Shahnaz Choudhri and to request cancellation of the deposition scheduled for November 8, 2024 at 11:00am. At the time this emergency motion was filed, a response was not received, and an agreement was not reached.

/s/ James Q. Pope
James Q. Pope

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on interested parties in the manner listed below on November 8, 2024.

23-03141 Notice will be electronically mailed, via the court's ECF noticing system to:

Thomas Michael Ballases on behalf of Plaintiff John Quinlan
ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Omar Khawaja
ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Osama Abdullatif
ballases@hooverslovacek.com

Matthew W. Bourda on behalf of Creditor Cypress BridgeCo, LLC
matthew.bourda@mhlhp.com

Matthew W. Bourda on behalf of Creditor Magnolia BridgeCo, LLC
matthew.bourda@mhlhp.com

Robert Paul Debelak, III on behalf of Creditor Cypress BridgeCo, LLC
bobby.debelak@mhllp.com

Robert Paul Debelak, III on behalf of Creditor Magnolia BridgeCo, LLC
bobby.debelak@mhllp.com

Robin L Harrison on behalf of Defendant A. Kelly Williams
rharrison@hicks-thomas.com

Angeline Vachris Kell on behalf of Plaintiff John Quinlan
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Plaintiff Omar Khawaja
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Angeline Vachris Kell on behalf of Plaintiff Osama Abdullatif
kell@hooverslovacek.com, avkell@gmail.com;doucet@hooverslovacek.com

Jennifer Lea MacGeorge on behalf of Defendant 2727 Kirby 26L LLC
service@jlm-law.com

Jennifer Lea MacGeorge on behalf of Defendant Jetall Companies, Inc.
service@jlm-law.com

Lenard M. Parkins on behalf of Defendant Shahnaz Choudhri
lparkins@parkinsrubio.com,
9141256420@filings.docketbird.com;bmcadden@parkinsrubio.com

Steven A. Leyh on behalf of Plaintiff John Quinlan
leyh@hooverslovacek.com, graham@hooverslovacek.com

Steven A. Leyh on behalf of Plaintiff Omar Khawaja
leyh@hooverslovacek.com, graham@hooverslovacek.com

Steven A. Leyh on behalf of Plaintiff Osama Abdullatif
leyh@hooverslovacek.com, graham@hooverslovacek.com

Timothy L. Wentworth on behalf of Defendant Randy W Williams Ch7 Trustee
twentworth@okinadams.com, bmoore@okinadams.com

/s/ James Q. Pope
James Q. Pope